

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

DONALD KUHN,

Defendant.

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Cause No. 4:16CR00303CEJ/NCC

FIRST MOTION FOR CONTINUANCE OF THE TRIAL SETTING

Comes now, Counsel for the Defendant and respectfully requests the above-styled cause be continued from the January 11, 2017 trial setting. In support of this motion, the Defendant states as follows:

1. The Defendant has been charged by indictment with Money Laundering, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i).
2. The Defense needs more time to research and investigate this case.
3. After completion of investigation and research, Defense Counsel hopes to be able to resolve this case without a trial.
4. Counsel has discussed this continuance request with Assistant United States Attorney, Stephen Casey, and he has no objection to the continuance request.
5. Further, Counsel has discussed this continuance request with the Defendant and he is in agreement with the request.
6. This request for an extension of time is made in good faith for all the reasons listed herein and not to vex or harass the Court or the Government, but to ensure the Defendant's Sixth Amendment right to effective assistance of counsel. The ends of justice will be best served by

excluding these periods of delay from calculating deadlines that would otherwise apply. 18 U.S.C. §3161(h)(8).

WHEREFORE, for the foregoing reasons the Defendant requests a continuance of the trial setting.

Respectfully submitted,

FRANK, JUENGEL & RADEFELD,
ATTORNEYS AT LAW, P.C.

By: /s/ Daniel A. Juengel
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CERTIFICATE OF SERVICE

I hereby certify that on January 4, 2017, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following.

Stephen Casey
Asst. United States Attorney
111 South Tenth Street, 20th Floor
St. Louis, Missouri, 63102

/s/ Daniel A. Juengel